

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

RAYMOND et al,
Plaintiffs

v.

UNIVERSITY OF HOUSTON,
Defendant

§
§
§
§
§
§
§

CA 4:05-cv-04149
(Magistrate Nancy K. Johnson)

**SECOND MOTION TO WITHDRAW AS COUNSEL
FOR RICKY RAYMOND**

TO THE HONORABLE NANCY K. JOHNSON:

COMES NOW Larry Watts (“Movant”), counsel for Plaintiffs Ricky Raymond, Donald Eubanks, and Virginia Lara, (cumulatively “Plaintiffs”), and makes this his Second Motion to Withdraw as Counsel for Ricky Raymond; for cause, Movant would show the following:

1. Movant has formerly moved for leave to withdraw as counsel for Ricky Raymond, and was denied.
2. Ricky Raymond has now twice filed a grievance with the State Bar of Texas (“SBOT”) against Movant and, falsely claiming to represent Plaintiffs Lara and Eubanks in the grievances. Twice the disciplinary counsel of the State Bar of Texas has dismissed Raymond’s grievances, most recently notifying Movant of the filing of the grievance and the dismissal on August 24, 2009.
3. Movant has made inquiry of the SBOT and been permitted to reveal these actions by Raymond to the Court as part of the basis for the claim that the relationship

between Movant and Raymond has so deteriorated that Movant cannot under any circumstances represent Raymond as his attorney.

4. According to the SBOT, Raymond gives his last known address as,

Ricky Raymond
5243 Canterway
Houston, Texas 77048

5. Raymond has not cooperated with Movant in the prosecution of this case since November 2008, and has reportedly been unavailable to either Movant or Raymond's fellow plaintiffs in this matter.

6. Movant has consulted with Eubanks and Lara and neither oppose Movant's withdrawal from representation of Raymond herein and both have stated that neither was privy to or in agreement with Raymond's grievances against Movant.

7. Movant is sending a copy of this document by FedEx to Raymond, Eubanks, and Lara.

8. Movant prays that the Court schedule a hearing on this motion and instruct the Clerk to notify Raymond so that he may appear and declare his opposition to Movant's withdrawal.

Respectfully Submitted,
WATTS&ASSOCIATES, P.C.

/S/LW

Larry Watts
S.B.N. # 20981000
P.O. Box 2214
Missouri City, Texas 77459
Ph. (281) 431-1500
Fax (281) 431-1298
WATTSTRIAL@GMAIL.COM

VERIFICATION

I, Larry Watts, verify upon penalty of perjury that the facts stated herein are true and correct, to my personal knowledge.

-S-LW
Larry Watts

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this document to opposing counsel by fax on this the 25TH day of August 25, 2009.

/S/LW
Larry Watts